



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 8, 2016

BY EMAIL and ECF

The Honorable Loretta A. Preska
Chief United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Brian Coll*, S2 15 Cr. 360 (LAP)

Dear Judge Preska:

The Government writes on behalf of the parties in the above-captioned case to jointly propose the following motion and trial schedule. First, consistent with our conversation with Your Honor's Deputy, the parties respectfully request that the trial begin on October 18, 2016. Assuming that jury selection will begin on that day, the parties propose the following schedule to file or exchange motions and other pre-trial documents:

- September 23: Government's Proposed Request to Charge and Voir Dire to defense;
- September 26: Motions *in Limine* due;
- October 3: Defense Objections and Proposed Revisions to RTC and Voir Dire due to Government;
- October 6: Oppositions to Motions *In Limine* due;
- October 7: Joint Request to Charge (noting any unresolved objections) due;
- October 10: Motions *In Limine* replies due;
- October 12: 3500 and Witness List to defense

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Additionally, the Government respectfully requests that the Court hold a final pretrial conference on October 12, 13 or 14, at a date or time that is convenient for the Court.

Respectfully submitted,

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United States Attorney
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